

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

CHARLIE DUNCAN, AS EXECUTOR OF
THE ESTATE OF PAUL W. MCVAY
Post Office Box 1123
Miamisburg, Ohio 45343

and

JANET FREEL, AS BENEFICIARY OF THE
ESTATE OF PAUL W. MCVAY,
975 Kirbert Avenue
Cincinnati, Ohio 45205

Plaintiffs,

-vs-

MINNESOTA LIFE INSURANCE CO.
c/o CT Corporation System
1300 East 9th Street, Suite 1010
Cleveland, Ohio 44114

Defendant.

CASE NO.: 3:17-cv-00025-TMR

JUDGE THOMAS M. ROSE

**DECLARATION OF PERRY R. STAUB,
JR. IN SUPPORT OF PLAINTIFFS'
REPLY IN RESPONSE TO
DEFENDANT'S OPPOSITION TO
PLAINTIFFS' REQUEST FOR
DISCOVERY**

PARISH OF ORLEANS
STATE OF LOUISIANA

Date: October 23, 2017

I, **Perry R. Staub, Jr.**, hereby declare under penalty of perjury, that the following is true
and correct:

1. During the course of the administrative appeal of this matter, I requested that a
complete copy of the administrative record be provided to me. AR 38.

2. The Administrative Record provided to me by MLIC in response to this request consisted of 153 pages. Plaintiffs will file this version of the administrative record under seal as per the original administrative record filing by MLIC.



PERRY R. STAUB, JR.